



State of Utah

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TO: Susan White, Mining Program Coordinator *SW*
FROM: Paul Baker, Reclamation Biologist *PB*
SUBJECT: Revegetation Variance, Staker and Parson Companies, Beck Street Pit, M0350019, Salt Lake County, Utah

Staker and Parson Companies have requested a variance from meeting revegetation performance standards for the highwall of the Beck Street Pit. The highwall benches will be scarified and seeded prior to retreating off each bench, but a revegetation success standard will not be applied to these areas. It is too dangerous to access these slopes, either by foot or with mechanized equipment, to reseed them or to measure revegetation success. In addition, no soil will be placed on the benches or highwalls, so while some vegetation is likely to become established, full revegetation success should not be expected.

The highwall on the north side of the mine will have an overall slope of 45 degrees, the maximum allowed without a variance, with slopes between the benches at about 51 degrees. Some raveling is anticipated, particularly as the exposed slope weathers. While the benches will be 20 feet wide when reclamation is done, some portions will become narrower or may cease to exist with time. This makes access by foot very dangerous, particularly near the top of the 900-foot-tall highwall.

The highwall on the south side is more competent, but it is much more steep. The overall slope will be 58 degrees with the slope between benches at 67 degrees. The more consolidated rock allows for the steeper slope, but there is also less unconsolidated material into which vegetation might become established. Although the slope might be stable, it would still be treacherous to walk the benches a few hundred feet above the pit floor in an attempt to measure vegetation cover or to do remedial seeding.

The plan the operator proposes, i.e. to seed the benches as they are completed but without a success standard, is an alternate means of achieving the purposes of the Act as far as possible within the limitations of safety and economic and engineering feasibility.

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